

**REMARKS**

Claims 1 through 21 are currently pending in the application.

Claims 22 through 40 have been canceled.

This amendment is in response to the Office Action of December 1, 2005.

Currently pending claims 1 through 21 have been amended to claim an automolding apparatus, rather than a method. Applicants assert that such claims are proper for the application.

**Supplemental Information Disclosure Statement**

Applicants note the filing of a Supplemental Information Disclosure Statement herein on November 23, 2005 and note that a copy of the PTO/SB/08A was not returned with the outstanding Office Action. Applicants respectfully request that the information cited on the PTO/SB/08A (which is the same as that of record to that date in the parent application hereto) be made of record herein.

Applicant has amended all currently pending claims 1 through 40 to be directed to automolding or molding systems as presented in the amendment filed by Applicant on October 28, 2004. Applicant requests an action on the merits regarding claims 1 through 40.

**35 U.S.C. § 112 Claim Rejections**

Claims 1 through 40 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Applicant has amended the claimed invention to comply with the provisions of 35 U.S.C. § 112, second paragraph to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Therefore, presently amended claims 1 through 21 are allowable under the provisions of 35 U.S.C. § 112.

**35 U.S.C. § 103(a) Obviousness Rejections**

Obviousness Rejection Based on Rosenfield et al. (U.S. Patent 4,752,668) in view of Tateyama et al. (U.S. Patent 5,442,416)

Claims 1 through 6 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Rosenfield et al. (U.S. Patent 4,752,668) in view of Tateyama et al. (U.S. Patent 5,442,416). Applicant respectfully traverses this rejection, as hereinafter set forth.

Applicant asserts that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure.

After carefully considering the cited prior art, the rejections, and the Examiner's comments, Applicant has amended the claimed invention to clearly distinguish over the cited prior art.

Applicant asserts that any combination of the Rosenfield et al. reference and the Tateyama et al. reference does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of presently amended independent claims 1, 4, and 7 because there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings, there has been no showing of a reasonable expectation of success for any combination of the cited prior art, no combination of the cited prior art teaches or suggests all the claim limitations of the presently claimed inventions, and the suggestion to make the claimed combination and the reasonable expectation of success both come solely from Applicant's disclosure, not the cited prior art.

Turning to the cited prior art, the Rosenfield et al. reference teaches or suggests a system for removing excess material from a semiconductor wafer employing an excimer laser for

ablative photocomposition. The Rosenfield et al. reference contains no teaching or suggestion whatsoever of the use of the excimer laser except as an independent device.

The Tateyama et al. reference teaches or suggests a resist processing system including at least two robots for conveying a wafer, a passage through which the robots can move, plural process units arranged along the passage, and a waiting unit for temporarily holding the wafer to be processed. The Tateyama et al. reference contains no teaching or suggestion whatsoever of the use of the resist processing system except as an independent device.

Applicant asserts that there is no suggestion whatsoever in either the Rosenfield et al. reference or the Tateyama et al. reference for any combination thereof. Applicant asserts that the only suggestion for any combination of the cited prior art is contained solely within Applicant's disclosure, not the cited prior art.

Therefore, presently amended independent claims 1, 4, and 7 are allowable as well as dependent claims 2, 3, 5, 6, 8, and 9 therefrom as the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions.

Applicant further asserts that there has been no showing of success for any combination of the Rosenfield et al. reference or the Tateyama et al. reference to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of presently amended independent claims 1, 4, and 7 because there is no suggestion in the cited prior art for any combination thereof. Applicant asserts that solely Applicant's disclosure can serve as a basis for any showing of success for any combination of the cited prior art.

Therefore, presently amended independent claims 1, 4, and 7 are allowable as well as dependent claims 2, 3, 5, 6, 8, and 9 therefrom as the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions.

Further, Applicant asserts that any combination of the Rosenfield et al. reference and the Tateyama et al. reference fails to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of presently amended independent claims 1, 4, and 7 because any combination of the cited prior art fails to teach or suggest all the claim

limitations of the claimed inventions. For instance, Applicant asserts that any combination of the cited prior art fails to teach or suggest the claim limitations of the presently claimed inventions of presently amended claims 1, 4, and 7 calling for “removing at least a portion of the layer of resist and at least a portion of the contaminants from the substrate using a laser in the automolding system”. In contrast to the claim limitations of the presently claimed inventions, any combination of the cited prior art, at best, teaches or suggests the use of an independent resist apparatus and an independent laser resist removal. Clearly, such is not the presently claimed inventions.

Therefore, presently amended independent claims 1, 4, and 7 are allowable as well as dependent claims 2, 3, 5,6, 8, and 9 therefrom as the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions.

Finally, Applicant asserts that any rejection of the presently claimed inventions of presently claimed inventions of presently amended independent claims 1, 4, and 7 based upon any combination of the cited prior art Rosenfield et al. reference and the Tateyama et al. reference is a hindsight reconstruction of the presently claimed inventions based solely upon the Applicant’s disclosure, not the cited prior art. Such a rejection is neither within the ambit nor the purview of 35 U.S.C § 103 and, clearly, improper.

Therefore, presently amended independent claims 1, 4, and 7 are allowable as well as dependent claims 2, 3, 5,6, 8, and 9 therefrom as the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions.

Obviousness Rejection Based on Rosenfield et al. (U.S. Patent 4,752,668) in view of Tateyama et al. (U.S. Patent 5,442,416) as applied to Claims 1, 4, and 7 above, and further in view of Haq (U.S. Patent 6,245,677)

Claims 3, 6 and 9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Rosenfield et al. (U.S. Patent 4,752,668) in view of Tateyama et al. (U.S. Patent 5,442,416) as applied to Claims 1, 4, and 7 above, and further in view of Haq (U.S. Patent 6,245,677).

Applicant respectfully traverses this rejection, as hereinafter set forth.

Applicant asserts that the addition of the Haq reference to any combination of the Rosenfield et al. reference and the Tateyama et al. reference does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of presently amended independent claims 1, 4, and 7 for the reasons set forth hereinbefore. The Haq reference merely teaches or suggests the encapsulation of semiconductor chips. Applicants assert that the Haq reference contains no teaching or suggestion of the encapsulation of semiconductor chips after the application of resist to wafers and the removal of some resist using a laser.

Therefore, presently amended independent claims 1, 4, and 7 are allowable as well as dependent claims 2, 3, 5, 6, 8, and 9 therefrom as the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions.

Applicant submits that claims 1 through 21 are clearly allowable over the cited prior art.

Applicant requests the allowance of claims 1 through 21 and the case passed for issue.

Respectfully submitted,



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